

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA  
Philadelphia Division**

Kelly Rooney,

*Debtor.*

Case No. 20-10219-AMC  
Chapter 13

**Motion to Modify Plan After Confirmation**

Debtor Kelly Rooney, through her attorney, moves this Court as follows:

1. The Debtor recently inherited substantial property. Exhibit A.
2. The inheritance necessitates full payment of unsecured creditors in this bankruptcy case.
3. The Debtor requests that the Court enter an order approving the plan filed at ECF No. 68 as the new confirmed plan.

For those reasons, the Court must grant relief in the form of order attached, and further in the Debtor's favor if necessary and proper under the law.

Date: August 9, 2024

CIBIK LAW, P.C.  
*Attorney for Debtor*

By: /s/ Michael A. Cibik

Michael A. Cibik (#23110)  
1500 Walnut Street, Suite 900  
Philadelphia, PA 19102  
215-735-1060  
help@cibiklaw.com